

WILLIAM GRIFFIN AND BILLIE)	
GRIFFIN,)	
)	
Plaintiff,)	
)	
v.)	Case 1:21-cv-02818
)	
AMERICAN SELECT INSURANCE)	
COMPANY,)	
)	
Defendant.)	

Jimmy Rooker (Plumber in Tennessee)
6883 HWY 14
Brighton, TN 38011
(601) 642-6591
[**jimmyrooker@draingoplumbing.com**](mailto:jimmyrooker@draingoplumbing.com)

- **The plumbing system at the home has failed because of wear and tear, rust, deterioration, and corrosion, including scaling and channeling.**
- **These conditions have caused damage to the pipes.**
- **The failed plumbing system is not functioning as intended.**

- **The failed plumbing system has caused water damage at the home, including water damage to the home including cracked pipes and bathroom toilet leak and water damage to bathroom cabinet.**
- **To repair the specific points of the cast iron plumbing system from which water escaped, it is necessary to tear out and remove portions of the home to gain access to the entire failed cast iron plumbing system. No other method of repair is proper. A fix to only part of the failed plumbing system is not adequate or possible.**
- **This was the appropriate and necessary method of repair at the time of the loss in July 2019 and the damage is continuing and ongoing and will only stop when the home's entire cast iron pipes plumbing system is torn out and replaced.**
- **Water and sewage is exiting breaches in the cast iron drain lines within the home's foundation system and has caused damage to its surroundings, including the structural fill supporting the drain pipes and the home's foundation, including the joists, as the water and sewage wick up into the foundation and joists.**
- **The home sits on a pier and beam foundation (also called a post and beam foundation).**
 - **The foundation supports the home.**
 - **There are two things under the foundation: (1) backfill which was compacted during the construction of the home; and (2) cast iron pipes plumbing system which is directly above backfill.**
 - **The backfill is a material used to construct the home.**
- **The conditions of the cast iron pipes depicted in the videos are the same or substantially similar to the conditions at the time the damage described above occurred.**

a. The facts or data considered by the witness in forming them;

Facts are gathered from data received from inspections, photos and estimate for repairs, specifically:

- My inspection of the above job location on August 10, 2020.
- Conversation with the homeowners during my inspection
- Videos and Photographs by **Draingo of Mississippi**
- Report by **Draingo of Mississippi**
- Estimate for Repairs by **Draingo of Mississippi**

- b. Any exhibits that will be used to summarize or support them;
- Videos and Photographs by **Draingo of Mississippi**
 - Report by **Draingo of Mississippi**
 - Estimate for Repairs by **Draingo of Mississippi**
- c. The witness's qualifications, including a list of all publications authorized in the previous 10 years;

See attached resume.

- d. A list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition;

None.

- e. A statement of the compensation to be paid for the study and testimony in the case;

\$225/hour

Jimmy Rooker 8/24/2022
Jimmy Rooker

CERTIFICATE OF SERVICE

I hereby certify that on August 25th, 2022, a true and correct copy of the foregoing was delivered to all counsel for parties at interest in this cause via U.S. mail and electronic mail:

**JAMES R. TOMKINS, 11161
SMITH & TOMKINS**
25 Century Boulevard, Suite 606
Nashville, TN 37214
(615) 256-1280
jtomkins@smithtomkins.com

Attorney for Defendant

/s/ Alex S. Fisher

Alex S. Fisher (BPR #31391)
MORGAN & MORGAN – NASHVILLE

1 - ROOKER RESUME

JIMMY ROOKER

BRANDON MS · 601-642-6591
JIMBOROOKER25@GMAIL.COM

Experienced residential and commercial plumber since 1996

EXPERIENCE

DATES FROM – 2016 TO PRESENT

MANAGER, DRAINGO OF MS LLC

Plumbing manager overseeing plumbing installation of residential and commercial service. Hiring and training all employees.

DATES FROM – 2003- TO 2016

LEAD SERVICE PLUMBER , DRAINGO LLC

- Service and replace hot water tanks, garbage disposals, pressure regulating valves, repair & replace toilets
- Fixing leaks and unclogging drains, install, repair/replace water supply lines, unclog sewer lines, repair/replace fixture drains/pipe threading
- Experience in all general plumbing

EDUCATION

CLASS OF 96

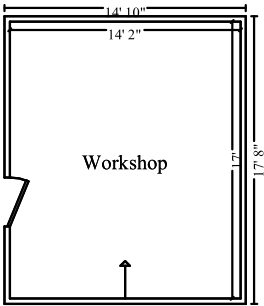
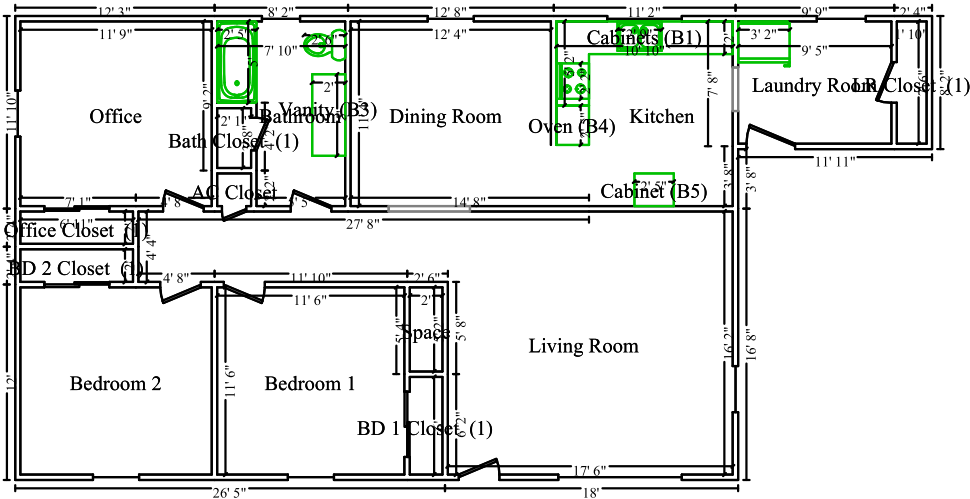
BOLTON HIGH SCHOOL,

SKILLS

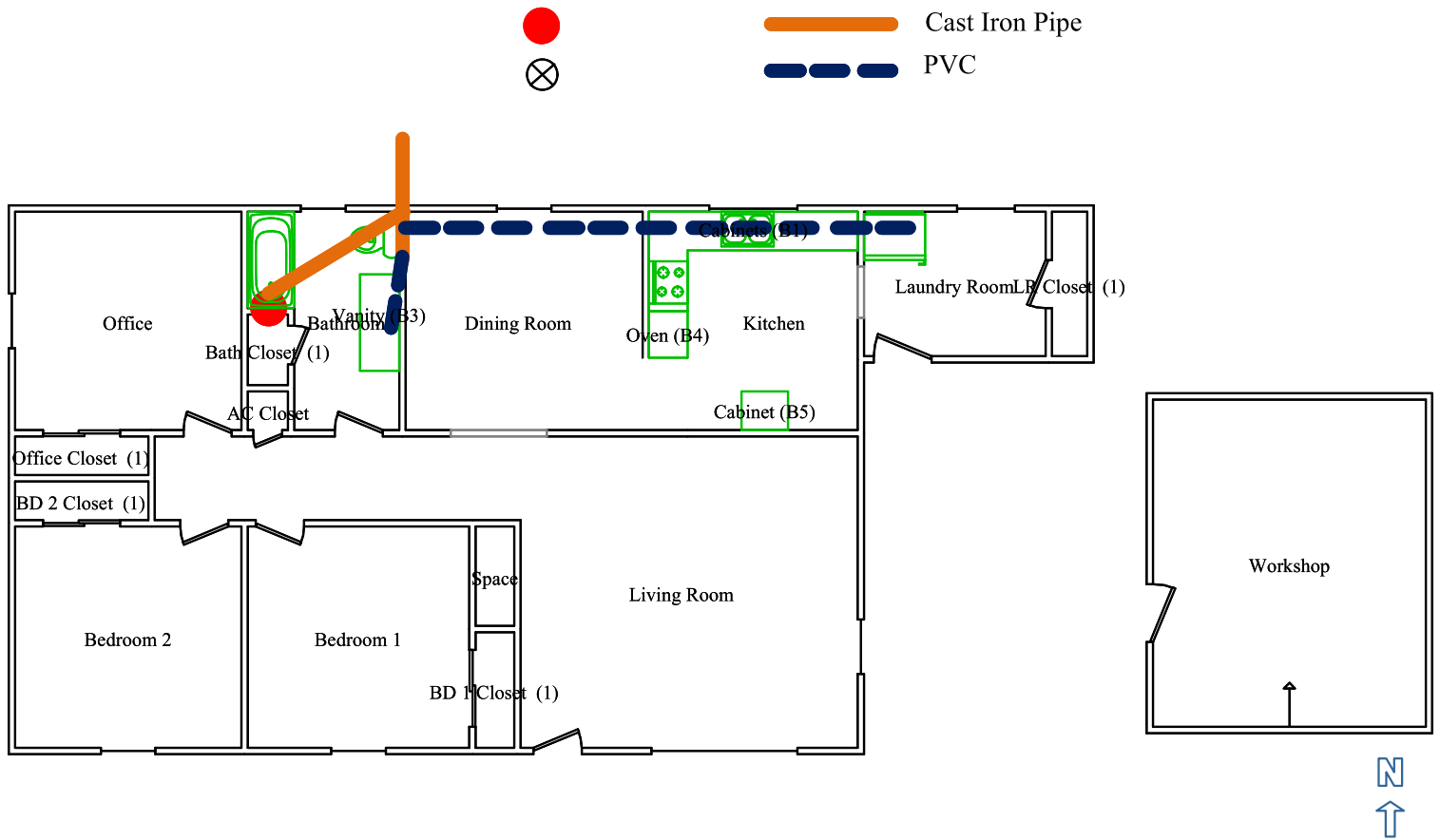
- 25 years of Plumbing Service and 12 years of management experience
- Over 25 years of customer service experience
- Proficient with Field Locate, Microsoft Office, Words and Excel
- Rough in, remodel, tenant improvement and finish work.
- Commercial and residential plumbing repair work

- Knowledgeable in commercial water heaters as well as tank less water heaters.
- Knowledgeable in codes, laws, rules and regulations
- I take pride in solving problems and finding innovative solutions
- Dedicated to helping others
- Skilled in Heavy equipment operations
- Drain specialist and leak detection trained. Can operate high pressure equipment, camera and locate trained.

2 - DIAGRAM OF HOUSE AND PLUMBING SYSTEM



Main Level



3 - DRAINAGE REPORT AND PHOTOS



DRAINGO OF MISSISSIPPI, LLC
6883 HWY 14, BRIGHTON, TN 38011
draingoplumbing@gmail.com
601-899-0000

PLUMBING REPORT

SUBJECT PROPERTY:

Name William Griffin
Address 128 Poplar St.
City, State, Zip Gadsden, TN 38337

Introduction:

We performed a camera inspection at the above referenced property on the date noted. The purpose of this video inspection was to evaluate the condition of the homes sanitary drainage system and the following are our findings.

System drains into: Septic Tank

Foundation Type: Off Grade / Crawl Space

Cast Iron goes to septic tank and septic tank is under slab of porch. House is conventional

Plumbing System Type: Plumbing system is comprised of both cast iron and PVC.

ANALYSIS OF CAMERA INSPECTION ON: August 10, 2020

OBSERVATIONS

Possible field line issue Broken going into septic tank. It's offset separated at the tank.

The interior of the cast iron drainage line is extremely rough and jagged.

LOCATIONS OBSERVED

Under porch slab



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DAMAGE IDENTIFIED:

MASTER BATHROOM: Cabinet Damage or other wood damage

CONCLUSION:

We believe the existing pipes should be repaired.

Additional Comments:

Only bathroom with Cast Iron. It was grooved and deteriorated and we recommend replacing the Cast Iron. Much of the piping is PVC throughout the rest of the home. Vent to Master Bathroom is Cast Iron and should be replaced.



ESTIMATED COST TO RE-PLUMB SANITARY DRAIN LINES TO PVC: \$9,952.00

Thanks for using our services,

Draingo Plumbing

All observations are the opinion of the Contractor. Opinions are based on collected information and if new information becomes available the Contractor reserves the right to change this opinion.

PICTURES WITH DESCRIPTIONS

PHOTO	DESCRIPTION
	1.
	2.



3.

PHOTO

DESCRIPTION



4.



5.

4 - DRAINAGE ESTIMATE

DRAINGO OF MISSISSIPPI

ESTIMATE

6883 HWY 14

BRIGHTON TN 38011

Phone: 601) 899-0000

INVOICE #

DATE

9691803

6/9/2020

CUSTOMER

USA DAMAGE RESPONSE TEAM

WILLIAM GRIFFIN

128 POPLAR ST

GADSDEN TN 38337

CUSTOMER ID

TERMS

564

DESCRIPTION	QTY	UNIT PRICE	AMOUNT
REMOVE AND SET ALL FIXTURES	2	745.00	1,490.00
CREATE ACCESS AND REMOVE CAST IRON PIPE	16	45.00	720.00
INSTALL SANITARY PIPE LABOR	16	81.00	1,296.00
TRASH CONTAINER	1	900.00	900.00
PREPARING PLANS, PLUMBING PERMIT, INSPECTIONS AND SUBMISSIONS	1	1,800.00	1,800.00
SUPPORT HANGERS	1	450.00	450.00
TRAVEL TIME TO THE LOCATION	4	100.00	400.00
MATERIAL INCLUDING PVC SCH 40 PIPE AND FITTINGS	3	150.00	450.00
VENT STACK & WASTE ARM INSTALL	2	823.00	1,646.00
CUT CONCRETE, REMOVE AND DISCARD (APPROX FT)	8	100.00	800.00
			-
			-
			-
<i>Thank you for your business!</i>		SUBTOTAL	9,952.00
		TAX RATE	0.000%
		TAX	-
		TOTAL	\$ 9,952.00

If you have any questions about this invoice, please contact
DGMS 601-899-0000 DRAINGOPLUMBING@GMAIL.COM